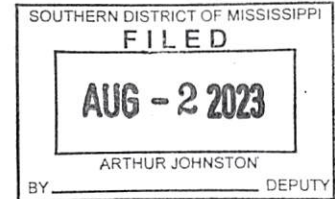


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

COMPLAINT



Easley
(Last Name) (Identification Number)

Chad Everette
(First Name) (Middle Name)

Pike County Jail
(Institution)

2109 Jesse Hall Mem. Rd Magnolia, MS 39652
(Address)

(Enter above the full name of the plaintiff, prisoner and address
of plaintiff in this action)

V.

CIVIL ACTION NUMBER:

5:23cv 72-KS-BWR
(to be completed by the Court)

Pike County Mississippi

Pike County Sheriff's Department

Sheriff James Brumfield

Brandi Di Moll, Detective
(Enter the full name of the defendant(s) in this action)

GENERAL INFORMATION

- A. At the time of the incident complained of in this complaint, were you incarcerated?
Yes () No (X)
- B. Are you presently incarcerated?
Yes (X) No ()
- C. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?
Yes () No (X)
- D. Are you presently incarcerated for a parole or probation violation?
Yes () No (X)
- E. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?
Yes () No (X)
- F. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?
Yes () No (X)

PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank.)

I. Name of plaintiff: Chad Easley Prisoner Number: _____

Address: 2109 Jesse Hall Mem. Rd

D Block

Magnolia, MS 39652

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions and places of employment of any additional defendants.)

II. Defendant: Brandi DiMoll is employed as detective

at Pike County Sheriff's Department

The plaintiff is responsible for providing his/her address and in the event of a change of address, the new address of plaintiff as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

PLAINTIFF:

NAME:	ADDRESS:
<u>Chad Easley</u>	<u>2109 Jesse Hall Mem. Rd Magnolia, MS 39652</u>

DEFENDANT(S):

NAME:	ADDRESS:
<u>Brandi DiMoll</u>	<u>2109 Jesse Hall Rd Magnolia, MS 39652</u>
<u>James Brunfield</u>	<u>2109 Jesse Hall Rd Magnolia, MS 39652</u>
<u>Pike County Sheriff's Department</u>	<u>2109 Jesse Hall Rd Magnolia, MS 39652</u>

<u>Pike County MS via Board of Supervisors</u>	<u>Magnolia, MS</u> <u>(County attorney is Wayne Dowdy)</u>
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OTHER LAWSUITS FILED BY PLAINTIFF

NOTICE AND WARNING

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any lawsuits in a court of the United States? Yes (☒) No (☐)
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse of this page or additional sheets of paper.)

CASE NUMBER 1.

1. Parties to the action: Chad Easley ; James Brumfield , Richard Bynum ,
Herbert Young, & Valerie Wells
2. Court (if federal court, name the district; if state court, name the county): Southern
District of Mississippi Federal Court
3. Docket Number: Civil Action No: 5:23-CV-00024-DCB-BWR
4. Name of judge to whom case was assigned: Bradley W. Roth & David Bramlette III
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) Still pending, though I have received
no update since June 8, 2022, I believe the jail is holding my mail.

CASE NUMBER 2.

1. Parties to the action: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____
4. Name of judge to whom case was assigned: _____
5. Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?) _____

STATEMENT OF CLAIM

- III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet(s) if necessary).

Pike County MS is run by a board of Supervisors who oversee the Sheriff's Department. They are responsible for the actions of its employees as well as policies practiced in the County DA's office. The Sheriff is an elected position, but is responsible for his employees. On 7/26/2022 I returned home from out of town, and someone ran into my bedroom (this person did not live at my home nor should they have been there) they had a terrified look on their face. I yelled

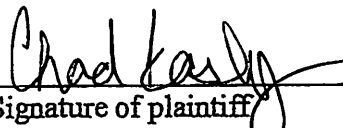
RELIEF

- IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

Compensatory and punitive damages; All Sheriff's deputies and detectives to wear and use body cameras while on duty; Periodic "internet scrubbing" and removal of the social media post publicizing my arrest. Continuing Education for Sheriff's Department employees & Detectives

Signed this 24 day of July, 2023.

I declare (or certify, verify or state) under penalty of perjury that the foregoing is true and correct.


Signature of plaintiff

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cont'd... ~~at~~ at this person to leave and chase them out. Assuming they went out my front door I opened it and was immediately snatched by my arm. I tried to flee but they held onto me, so we had a fight. These people wore no clothing that identified themselves as law enforcement and they did not identify themselves. Only later did I notice they were wearing badges which were hidden beneath their overhanging stomachs. After I called to my mother to call the police, they stopped assaulting me to laugh at me and told me they were the police. I stopped fighting them and was placed in cuffs. The police find the third party hiding under a bed. They never give me a reason for their being there, but call a transport officer to bring me to the jail but never tell me why I am being arrested. I was told nothing until 8-12 hours later when the jail officer told me I was being charged with possession with intent to distribute. The third party is not mentioned in the affidavit. I can not understand why I am charged for drugs that were not taken off my person, in range of my person, or to the best of my knowledge from a location only I have access to. This is a false arrest. Also, I was not even present when the drugs were found!

2. Defamation - The Sheriff's department posted photographs of me and describe the charges to their social media before I even saw a judge. The only purpose of this is to cause shame and invite ridicule.

3. Denial of right to Counsel - a public defender was assigned to me, named John McNeil. He was not present at my preliminary hearing, but another alleged attorney named "Cason" who told me I must waive my preliminary hearing in order to have my bond reduced. He did not explain any consequences of waiving this hearing. My bond was reduced to \$50,000 by an elected judge

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who does not have a law degree, I was not informed I would be held indefinitely waiting on a grand jury to indict me and have no further access to the courts unless I hired a private attorney.

4.) Excessive bail - I have continually been denied the right to revisit bond... being told "hire an attorney" or "your bond is low enough" by a jail house menial secretary, not a judge. I have no criminal history, I have ties to the community, and must appear at all court proceedings to do what I can to salvage something of ~~the~~ my reputation, which can never fully be returned to me.

5.) Denial of right to a Speedy trial. - Waiving preliminary hearing should put my case before the grand jury, but it has been one year with no indictment. I can't see the purpose of prolonging this. I have written the DA, but never received a response. Either there is enough evidence to indict or not, there will not be any more with me sitting in this jail.

As to qualified immunity, Ms. DiMoll's tenuous relationship with the truth should strip her of that shield. First, she includes no information that would exonerate me, such as the third party hiding beneath a bed. Additionally, the wrong date, and reason for coming to my house, that she identified herself as police and other omissions clearly show a reckless disregard for the truth.